### Safety Zone - Burnside Transfer Facility Security Plan

8			
Safety Zone Da	ily_Checklist	and the same year, and the same of the sam	dr
i. Gates (auto & manual) locked, fences intact?	Yes	No .	
2. Perimeter patrol completed, fences intact?	сур		
3. Lighting adequate?	. (B		].
4. Camera surveillance?	(p)		
5. All cameras working properly?		· No	
6. Intruder Detection System operational?	Ŷ		
Any unauthorized vehicles observed?		Ob .	
Were these vehicles reported to site supervision?	NA	Ψ,	
. Any unusual sightings or events during patrols?	8AS Leaking	North	above
LEASE REPORT ANY MALFUNCTIONS OF SECU		DUPONT E	tipt C
ate: 5/24/2012	n - <u>E</u>	North DUPONT E Strai	gntof
me: 21,30			24
(b) (7)(C), (b) (6)			
OTES: (b) (7)(C), (c) (c) (d) (d)			
(7)(C), (b) (6)			

Security Breach — Call Ott — CONFRONT TRESPASSERS WITH CAUTION. CONTACT FACILITY SECURITY OFFICER (T. L.)

HOTE: AHY SITE EMPLOYEE INVOLVED IN TAMPERING WITH SECURITY DEVICES WILL BE SUBJECT TO DISCIPLINARY ACTION. (LE SUSPENSION) AND OR TERMINATION) IUIUI

0460

### DuPont Burnside Plant Work Permit

In case of EMERGENCY. RALLY SPOTS are 1. DuPont Shop 2. Contractor Shop issued to: Supervisor: Permit valid from: Date: 0700 Time: To Date: Time: Location: Description of work: 130X on TYPE OF WORK: General Work...(Ref. block "A") ] Equipment Preparation ( Ref. " F. " ) Flame or Spark Producing Work.. (Ref " B ") ] Drilling/Grinding/Chipping... Electrical Work...( Ref. " C ") [ ] Asbestos/NARF... Railroad Work (Ref. "D") ADDITIONAL PERMITS REQUIRED: Confined Space Entry Permit Manlift Exit Wall Penetration [ ] Crane Basket ] Other ] Line Break Permit (Ref. "E") Hydro Blasting... [ ] Grating Removal ] Excavation \* Gas Tests %02 %EXPLOSIBILITY(LEL) TOXICITY TESTED BY: Monitor Used: H<sub>2</sub> SO2 H2S In Area: In Equipment: Specify Order: SPECIAL HAZARDS TO PROTECT AGAINST: JHA REQUIRED [ ] Radiation Corrosive [ ] Noise 1 Heat Stress ] Hot Water/Steam Other Flammability Thermal ] Inert Atmosphere 1 Falls 1 Toxicity ] High Voltage MINIMUM SAFETY PRECAUTIONS: JHA REQUIRED Rubber Gloves [i- Work Gloves Barricade area, Yellow' 'RED' Critical Lift Plan Rubber Boots | Bafety Harness 1 Hard Barricade Spark Proof Tools 1 Acid Hood ] Metatarsal Guards Mother manuft Nomex - Coveralis/Hood/Gloves Chemical Goggles/Spoggles 1 Heat Gloves and Sleeves ] Warning signs Respirator: Circle type below. Face Shield Water hose available PSM Trained Chem fullface Totally Encapsulated Suit ] Keep area wet HAZWOPER Trained Standard Acid Suit Kevlar Gloves Tyvek 12-3M-8511 Particulate Respirator Rain Suit Hearing Protection Saranex Suit ] Breathing Air ] Pink Acid Suit ] Radio Issued? No. Pull fuses Breathing Air w/escape bottle REFERENCE BLOCKS: Area Prep. Block "A" Fire Safety Block "B" Electrical Safety Block "C" Electrical Safety contd. First Break Block "E" Equip. Prep. Block 'F' Rope off area ] Fire extinguisher Lock, Tag, Try & Test [ ] Proper grounding [ ] Full Acid Suit 1 Stop transfers [ ] Post work signs ] Water hose running Standby required 2300vac 1 GFCI ] Lock, Tag, Try 1 Disconnect ] Erect barricade Keep area wet Railroad Permit Block "D" Close proximity work Pink Acid Suit [ ] Blank Block roadway Fire blanket reg'd > 50 volts 1 Derail "A" locked? Level A Flush, non furning ] Lock Tag & Try Fire watch req'd NOMEX as required Derail "B" locked? Steam Suit Lock, Tag, Try ] Voltage Rated Gloves ] Blue flag up THE SUPERVISOR RECEIVING THIS PERMIT VERIFIES THAT ALL WORKERS: Supervisor's Initials Date: ()5-2/3-Are skilled in appropriate craft/trade Know emergency evacuation, alarms and rally spots Have been through General Safety Orientation Know the procedure for completion of job SAFELY Understand applicable HAZCOM requirements Know Proper Incident/Injury Reporting Procedure Have been told the HAZARDS of the job Have inspected all tools/equipment/scaffolding Know the location/use of safety shower/eye wash stations Understand HOUSEKEEPING is part of the JOB Know the location/use of Gaitronics system Understand all "SPECIAL PERMIT" requirements ENVIRONMENTAL CONCERNS: [ ] Use drain pans 1 Have Soda Ash available ] Use portable acid pump Other: I Use a funnel and hose 1 Dike or dam ditch Use portable tank on trailer APPROVED BY: Contractor Contract Supervisor Coordinator APPROVED BY: JOB COMPLETED ? YES NO Date: DuPont Supervisor as needed.

#### **EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS**

Al ID: 67572 - E I Dupont de Nemours & Co Inc - Burnside Plant A H2SO4 Contact Facility

Activity Number: PER20060002 Permit Number: 0180-00007-V4 Air - Title V Regular Permit Major Mod

#### All phases

	Sulfuric acid						
Subject Item	AV	g lb/hr	Ma	x lb/hr	Tons/Year		
EQT 019		0.04		0.04	0.16		
EQT 020		0.04	-	0.04	0.18		
EQT 022		15.25		15.25	0.08		
EQT 023	<	0.001	<	0.001	0.001		
EQT 024	<	0.001	<	0.001	0.001		
EQT 025	<	0.001	<	0.001	0.001		
EQT 027		0.15		0.15	0.02		
EQT 030		14.38		16.3	63		
FÜG 002		0.12	-	0.12	0.52		

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals

Permit Parameter Totals:

Sulfuric acid: 63.96 tons/yr

**Emission Rates Notes:** 

Incident Number, Incident Status, Date/Time Incident Occurred	Incident Description	Incident Location	Lead Investigator, Follow-Up Status	Incident Source Al ID, Source Name, Source Municipality, Total # of Source Records	Incident Resolution
36799 Closed 09/20/2000 8:30 AM	s00-3750 Pipeline failure in the return line from Motiva to Dupont. DRL	Dupont 3460 Hwy. 44	(b) (7)(C), (b) (6) Closed	67572 E I Dupont Nemours & Co Inc Darrow	
43767 Closed 06/29/2001 12:00 AM	c01-2024 Dupont had an acid release that was not reported. Vehicles were sprayed with the acid - imr	DuPont Burnside Facility	(b) (7)(C), Closed	67572 E I Dupont Nemours & Co Inc Darrow	
74068 Closed 10/04/2004 2:15 PM	s04-3844 An operator found pooling of sulfuric acid around the base of a tank, col	Dupont 3460 Hwy. 44 Darrow	(b) (7)(C), (b) Closea	67572 E I Dupont DeNemours & Co Inc - Burnside Plant A H2SO4 Contact Facility	
77741 Closed 03/21/2005 5:30 PM	s05-0909 Shut down due to some process problems Still investigating incident, found a problem with a vessel	3460 Hwy 44 Darrow	(b) (7)(C), (b) Closed	Darrow 67572 E I Dupomours & Co Inc - Burnside Plant A H2SO4 Contact Facility Darrow	
96158 Closed 05/12/2007 7:30 AM	Temporary release of sulfuric acid plant was in startup mode two blowers involved emergency shut		(b) (7)(C), (b) (6) Closed	67572 E I Dupont de Nemours & Co Inc - Burnside Plant A H2SO4 Contact Facility Darrow	
101816 Closed 12/19/2007 12:00 AM	507-4395  During startup they had an upset condition where there is a leak in their economize that would allowWater to go	Dupont Burnside Plant 3460 Hwy 44 Darrow	(b) (7)(C), (b) (6)  Deferred until next inspection	F17572 E I Dupont de Nemours & Co Inc - Burnside Plant A H2SO4 Contact Facility	
113225 Closed 03/09/2009 12:00 PM	s09-0674 Martin Transporthose connection came loose during transferjd	Martin Transport Dupont Chemical, 3640 Hwy 44 Burnside	(b) (7)(C), (b) (6) Closed	67572 E I Dupont de Nemours & Co Inc - Burnside Plant A H2SO4 Contact Facility Darrow	
115748 Closed 06/15/2009 9:30 PM	s09-1858 DuPontDrip discovered or barge unloading line for sulfuric acidjd	DuPont Burnside Plant, 3460 Hwy 44 Darrow	(b) (7)(C), (b) (6) Closed	67572 E I Dupont de Nemours & Co Inc - Burnside Plant A H2SO4 Contact Facility Darrow	Facility submitted writter reportincident closed.
126012 Closed 08/29/2010 3:14 AM	s10-3136 Dupont Burnside Plant release from a gasket leak on downstream flange of	Dupont Burnside Plant 3460 Highway 44 Darrow	(b) (7)(C), (b) (6)	67572 E I Dupont de Nemours & Co Inc - Burnside Plant A H2SO4 Contact Facility Darrow	
138126 Closed 03/20/2012 11:48 AM	c12-5807 complainant alleges that the facility has been experiencing ongoing releases since December	Dupont Burnside Facility Darrow	(b) (7)(C), (b) (6)	67572 E I Dupont de Nemours & Co Inc - Burnside Plant A H2SO4 Contact Facility Darrow	
140234 Closed 05/31/2012 1:00 PM	c12-10313 Facility has had a leak of sulfur trioxide from the cold interpass heat exchanger since December 2011	3460 Hwy 44 Darrow	(b) (7)(C), (b) (6) Closed	67572 E I Dupont de Nemours & Co Inc - Burnside Plant A H2SO4 Contact Facility Darrow	
142304 Closed 08/22/2012 1:00 PM	c12-14832 hydrocarbons and acid released from railcar to ground, then to drainage ditch	3640 Hwy 44 Darrow	(b) (7)(C), (b) (6) (6)(1)(C) (Closed	67572 E I Dupont de Nemours & Co Inc - Burnside Plant A H2SO4 Contact Facility Darrow	Site visit

Incident Number, Incident Status, Date/Time Incident Occurred	Incident Description	Incident Location	Lead Investigator, Follow-Up Status	Incident Source AI ID, Source Name, Source Municipality, Total # of Source Records	Incident Resolution
144027 Closed 10/19/2012 1:00 PM	s12-18292 derailed tank cars carried sulfuric acid CML	outside of Dupont Plant Geismar	(b) (7)(C), (b) Closea	67572 E I Dupont de Nemours & Co Inc - Burnside Plant A H2SO4 Contact Facility	
151079 Open 09/18/2013 2:00 AM	s13-32944 release of sulfuric acid	3460 Hwy 44 Darrow	(b) (7)(C), (b) (6)	67572 E I Dupont de Nemours & Co Inc - Burnside Plant A H2SO4 Contact Facility Darrow	
151987 Closed 10/31/2013 12:00 AM	c13-34732 (b) (7)(C). is a former lemployee of Dupont and has known about this leak since it's beginning in	Dupont Burnside, Hwy 44 River Road Darrow, LA	(b) (7)(C), (b) (6)	67572 E I Dupont de Nemours & Co Inc - Burnside Plant A H2SO4 Contact Facility Darrow	

DuPont Burnside Title V and PSD Permit Modification Fugitive Emission Calculations Source I.D. 13

Pollutant	Total Emissions (lbs/hr)	
Total VOC	0.19	0.83
Sulfuric Acid	0.12	0.52

# DuPont Burnside Title V and PSD Permit Modification Fugitive Emission Calculations Source I.D. 13

Component	Service	No. of	Emission Rate	Stre	am Composition	(wt%) <sup>1</sup>	E	missions (lb/	hr)
Type		Components	(lbs/hr/comp)	voc	SO <sub>3</sub>	H₂SO₄	VOC	H <sub>2</sub> SO <sub>4</sub> <sup>2</sup>	H₂SO₄
Valves	Gas	8	1.38E-04	12.0			0.0011	0.0000	0.0000
		16	1,38E-04		9.0		0.0000	0.0027	0.0000
	Liquid	128	2.38E-04	12.0			0.0305	0.0000	0.0000
		180	negl.			93-98	0.0000	0.0000	negl.
		30	2.38E-04		100.0		0.0000	0.0088	0.0000
		61	negl.			100.0	0.0000	0.0000	negl.
Pumps	Liquid	9	9.13E-04	12.0			0.0082	0.0000	0.0000
	***	17	negl.			93-98	0.0000	0.0000	negl.
		2	9.13E-04		100.0		0.0000	0.0022	0.0000
Connectors	All	591	2.50E-04	12.0			0.1480	0.0000	0.0000
		106	2.50E-04		9.0		0.0000	0.0325	0.0000
		1230	negl.			93-98	0.0000	0.0000	negl.
		220	2.50E-04		100.0		0.0000	0.0675	0.0000
Open-ended		9	2.50E-04				0.0023	0.0000	0.0000
valves		10	2.50E-04		9.0		0.0000	0.0031	0.0000
		20	negl.			93-98	0.0000	0.0000	negl.
		8	2.50E-04		100.0		0.0000	0.0025	0.0000
		6	negl.			100.0	0.0000	0.0000	0.0000
				TOTAL (lbs/hr)			0.19	0.12	0.00
				TOTAL (tons/yr)			0.83	0.52	0.00

<sup>&</sup>lt;sup>1</sup> Compositions of non-volatile components are not shown. In the calculation, stream compositions are normalized so that the volatile components add up to 100%.

<sup>&</sup>lt;sup>2</sup> Emissions of SO<sub>3</sub> immediately react with water in the atmosphere to form H<sub>2</sub>SO<sub>4</sub>. Therefore the total emisions of SO<sub>3</sub> were multiplied by the ratio of the molecular weight of H<sub>2</sub>SO<sub>4</sub> to the molecular weight of SO<sub>3</sub> (98.08/80.06).

#### DuPont Burnside Title V and PSD Permit Modification Fugitive Emission Calculations Source I.D. 13

		Emission Fac	Emission Rate <sup>4</sup>		
Component Type	Service	0 ppm	1-500 ppm <sup>1</sup>	>500 ppm <sup>2</sup>	lb/hr/component
Valves	Gas	1.45E-06	9.34E-04	1.28E-02	
Valves	Liquid	1.07E-06	2.00E-03	2.17E-02	
Pumps	Liquid	1.65E-05	7.00E-03	8.26E-02	
Connectors	-	1.34E-06	1.64E-03	2.33E-02	
Open-ended valves	-	1.34E-06	1.64E-03	2.33E-02	2.50E-04
All	Sulfuric Acid		-	-	negi.

<sup>&</sup>lt;sup>1</sup> Emission factors for 1-500 ppmv based on SOCMI correlation with screening values of 500 ppmv.

<sup>4</sup> Percentages of leaking components based on:

98.0% non-leaking (0 range)

1.0% in 1-500 ppmv range

1.0% in >500 ppmv range.

<sup>&</sup>lt;sup>2</sup> Emission factors for >500 ppmv based on SOCMI correlation with screening values of 10,000 ppmv.

All emission factors based on SOCMI Leak Rate/Screening Value Correlations(Table 2-9), and Default Zero Values: SOCMI Process Units (Table 2-11), from Protocol for Equipment Leak Emission Estimates; EPA-453/R-95-017, November 1995.

<sup>&</sup>lt;sup>5</sup> Sulfuric acid has a vapor pressure of less than 0.00003 psi at 95 F; therefore, emisisons of sulfuric acid are negligible.



Created by: Jeffrey M Simoneaux on 03/18 at 08:19 PM

Operators on Duty	Working for?	Why?
(b) (7)		
(C), (b)	(b) (7)(C).	vac
	(b) (7) (C), (b)	(b) (7) (c), (b)

#### Shift Log:

1. SO3 leak found above CIP escaping from continuously leaking spots , not being gathered by suction hoses. Same leak site as previously notified three weeks ago , seems to be travelling offsite will take a closer look at fence line . Mangement ((b) (7)(c), (b) notified, left message, no answer. will try another method perhaps another supervisor . Since, management previously advised not to email being it created a legal document . Got in touch with (b) (7)(c), (b) who advised to contact (b) (7) to get some guys to come look at the leak as long as we had some doubt as to whether it was going off site . (b) (7)(c) called back and we updated her . Will call back if we can not stop leak .

EXHIBIT In the second s

7	Burnside Initial Incident Report	1
	(for internal use only)	
	Incident Information	
	Date reported:	
	8.5.11	
	Title:	
ŀ	Incident date: Incident time:	
	55 P 1.	Å
	Area:	
F	Brief Description of known facts:	
	Gas Leak @ converter 1st pass exold due to vacuum hose melt	ed.
I	Immediate action taken: Notified supervision + monitored area	
(	Other action recommended: contracted contractor to replace upon him here	સ્ત
E	Environmental deviation (Title V, other):  None	ore has
C	Chemical released: 503	
R	Report Completed by: (b) (7)(C), (b) (6)	

# **Burnside Initial Incident Report** (for internal use only) Incident Information Date reported: 6-16-11 Title: Incident date: Incident time: Area: Railcar Durk 147Bb containing BASF Spent sulfurience'd was scheduled to be shapped if it's heel would be 9" or least. After unloading the railcar the ROB was 34" Instruction was written if the hed was over 9" to load it with 99% sulfure acid This procedure was successful on diluting a prior BASF spent reilear, while loading the reilear a reaction occurred cousing the reilear to fame and bubble out the dome. The reilear was loaded to a total outage of 36" Immediate action taken: Stopped leading operation Other action recommended: Stay clear of the area until reaction stopped, Environmental deviation(Title V, other): less than 5 gallins outside of the spill pan Chemical released: Spent acid & surfacant (Rhodical) on to spill pan Report Completed by:

# Burnside Initial Incident Report (for internal use only) Incident Information Date reported: 10/2/11 Title: Piping leals on SO3 system Incident date: 11:30/11:45 am approx. Brief Description of known facts: TWO KBR contractors were working in the area and noticed of weakfreed what appeared to be funes/vapors from So3 piping. They immediately notified the control Room of the possible leak. The field operator verified and the shift notified supervision. Immediate action taken: Shufdown the SO3 production, and begin taking the System to a non-funing state. A once complete, maintenace will change the piping. Other action recommended: None Environmental deviation(Title V, other): Chemical released: SO3 fumes (SO2 mist) 12 Report Completed by:\_

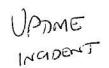
# Burnside Initial Incident Report (for internal use only) Incident Information Date reported: 5/17/11 Title: SO2 Inlet Analyzer Incident date: Incident time: 5/14/11 Approx: 2 - 3pm Area: Converter Brief Description of known facts: The inlet analyzer was not operating correctly. Douteand The emissions of SDz alarmed. The three hour average exceeded the permit ruged on the DCS. The analyzer was then set to a manual entry until fixed. Immediate action taken: Supervision Contacted + E/I was to work on issue. Other action recommended: Communicating to all operators of impositive the SO2 Inlet Entry In manual/Enable in a timely manner to mitigate a DCS 3 hour excursion deviation Environmental deviation(Title V. other): Environmental deviation(Title V, other): None Chemical released: Report Completed by:\_

Burnside Initial Incident Depart
Burnside Initial Incident Report
(for internal use only)
Incident Information
Date reported: 5/17/11
Opacity of Stack
Incident date: Incident time: 11: 15 am
Area: Stack
Brief Description of known facts: An opacity reading/measurement was performed, due to a visible stack. Operator informed supervision and worked with the board operator to make adjustments.
Immediate action taken: Made adjustments = with process to rectagate
Other action recommended: Performed stack reading the next morning
Environmental deviation(Title V, other): Title V air
Chemical released:
$SO_2$
(b) (7)(C), (b) (6)  Report Completed by:

## **Burnside Initial Incident Report** (for internal use only) Incident Information Date reported: 5/15/2011 Title: IPAT 98 (CIL) Woler leak Incident date: Incident time: 5:30 pm Approx Area: 98 (CIL) Woler pH maintained le on the DOI outfall (River water return pit) it was okay. Immediate action taken: Contacted Supervision 2000 Other action recommended: Begin to Shut the Spent side down. Supervision decided to shut the contact down for lock out & repair Environmental deviation(Title V, other): None Chemical released: Weak acid

Note: Deliver copy of form to manager upon completion

Report Completed by:



At 5:23 inside operator got a low PH alarm on 301 PH (exit CIL cooler water) followed by a drop in 001 PH. Immediately the outside operator went out to check the probe. After visually inspecting probe outside operator immediately caught a sample of water next to probe and ran the ph which was 5.03. Then the outside operator immediately went to the Dry Tower CIL cooler and unplugged the exit water drain and caught a sample. The ph of the Dry Tower Cooler exit water was normal at about 7.4. Then the outside operator caught a sample of the IPAT CIL cooler exit water which was running at 2.2 ph. Since this clearly indicated where the acid leak was we then immediately called for and got no answer could not leave a message. We then immediately notified who said as long as we could maintain 6 ph on the 001 (River water return pit) he was okay with it.

We were unable to locate ' number so we then called (C). (b) who said he would get some more opinions and get back to us. Shortly after we hung up with (b) (6) we went back out and found that the caustic addition to 001 (river water pit) was not functioning and in fact we hadn't gotten any caustic to the pit. (b) (6) called (b) (6) called us and suggested we start cutting spent off and burning out which we were already in the process of doing once we found out that the caustic addition was frozen. At 17:50 all spent guns were off. out for 30 called to check on plant. We burned spent furnace out for 30 minutes. At 18:20 spent burners were shut off. At 19:15 we shut down sulfur and by this time and other maintenance personnel were on site. River water pumps were shutdown because low PH water was still being pumped into condenser. Later everything was locked out for maintenance on IPAT Cooler.